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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA, )

14 Plaintiff, )

15 v. )

16 MAHALIA MARION SLOAN, )

17 Defendant. )  
18 \_\_\_\_\_ )  
19

No. CR 11-00896-DLJ

STIPULATION AND ~~PROPOSED~~  
DISCOVERY PROTECTIVE ORDER  
BETWEEN THE UNITED STATES AND  
DEFENDANT

20 The above-captioned defendant and the United States of America, by and through their  
21 counsel of record, hereby agree and stipulate as follows:

22 1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal  
23 Rules of Criminal Procedure, and its general supervisory powers.

24 2. This Order pertains to all discovery provided to or made available to defense  
25 counsel as part of discovery in the above-cited case.

26 3. The discovery and information therein may only be used in connection with the  
27 litigation of this case and for no other purpose. Defense counsel will return the discovery to the  
28 government, or certify that it has been shredded at the conclusion of the case, which includes  
appellate review and the resolution of any competency of counsel issues.

**FILED**

DEC 21 2011

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

4. Defense counsel shall not provide any of the discovery to any person other than to his/her respective defendant/client, or attorneys, law clerks, paralegals, secretaries, experts, and investigators involved in the representation of his/her defendant/client, for the purpose of said representation. Further, in disclosing discovery to defendants, personal information contained in the discovery, including individuals' dates of birth, addresses (physical and email), telephone numbers, social security numbers, and driver's license numbers, shall be redacted, and shall not be provided to any defendant in any manner or form.

5. Defense counsel shall advise his/her respective defendant/client, employees, other authorized members of the defense team and defense witnesses of the terms of this stipulation and order, and that use of the subject discovery materials for a purpose other than in connection with the litigation of this case may be subject to criminal sanctions.

6. Defense counsel will store the discovery in a secure place and will exercise due diligence to ensure that it is not disclosed to third persons in violation of this agreement. Similarly, if defense counsel makes or causes to be made, copies of any of the discovery, defense counsel will exercise due diligence to maintain control of said copies and to ensure that said copies are stored in a manner to safeguard against the inappropriate use of said materials.

DATED: December 20, 2011

MELINDA HAAG  
United States Attorney

/s/  
JOHN N. GLANG  
Assistant United States Attorney

/s/  
ELIZABETH C. PETERSON.  
Attorney for defendant Mahalia Marion Sloan

**ORDER**

Based upon the stipulation of the parties, and for good cause shown, the Court hereby ORDERS that the terms of the stipulation between the United States and the above-captioned

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defendant pertaining to the discovery in this case be imposed.

IT IS SO ORDERED.

DATED: *December 21, 2011*

  
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NATHANAEL COUSINS  
United States Magistrate Judge  
Northern District of California